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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91196299
Party	Plaintiff Connect Public Relations, Inc.
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Submission	Stipulated/Consent Motion to Extend
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Date	10/19/2016
Attachments	Stipulated Motion for Extension of Trial Dates.pdf(76635 bytes)

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Opposition No. 91196299 (Parent)

CONNECT PUBLIC RELATIONS, INC.,
Opposer,

v.

DIGITALMOJO, INC., Applicant.

Cancellation Nos. 92054395 & 92054427

DIGITALMOJO, INC., Petitioner,

v.

CONNECT PUBLIC RELATIONS, INC.,
Respondent.

**STIPULATED MOTION FOR
EXTENSION OF TRIAL DATES**

Applicant and Petitioner, Digitalmojo, Inc., and Opposer and Respondent, Connect Public Relations, Inc., during September 24 - October 17, 2016, have been discussing the need for additional time to consider, further assess the acceptability of, and otherwise address, the content

of discovery requests made and responses provided. The parties have agreed to, and Applicant and Petitioner Digitalmojo, Inc. has consented to, this motion.

More specifically, Connect Public Relations, Inc., Opposer in Opposition No. 91196299, and Respondent in cancellation actions Cancellation No. 92054395 and Cancellation No. 92054427, by stipulation of and on behalf of the parties to these consolidated opposition and cancellation proceedings, requests the trial dates of these proceedings be reset to provide an additional fourteen (14) days, according to the schedule set forth below. Applicant and Petitioner, Digitalmojo, Inc., have agreed to such fourteen-day extension on October 17, 2016.

By this consented motion, the parties note that the non-standard trial schedule for these consolidated actions does not fit within the options of the Board's online filing facility for such motions, so Opposer has employed this method to advise the Board of the agreement of these parties, and request its approval. Connect Public Relations, Inc., has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein. Connect Public Relations, Inc., has provided the below email addresses herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board. These email addresses are:

kcannon@chcpat.com

rgillan@chcpat.com

docketclerk@chcpat.com

tom@thomascooklaw.com

Plaintiff's 30-day Trial Period was currently set to close on October 14, 2016 under the current trial schedule, which schedule was requested by Applicant on September 24, 2016.

Connect Public Relations, Inc., requests that such date be extended for 14 days, or until October

28, 2016, and that all subsequent dates be reset accordingly, and Opposer/Respondent and Applicant/Petitioner do therefore request the Board approve the reset trial schedule set forth below:

Time to Answer: CLOSED
Deadline for Discovery Conference: CLOSED
Discovery Opens: CLOSED
Initial Disclosures Due: CLOSED
Expert Disclosure Due: CLOSED
Discovery Closes: CLOSED
Plaintiff's Pretrial Disclosures: CLOSED
Plaintiff's 30-day Trial Period Ends: 10/28/2016
Defendant/Counterclaim Plaintiff's Pretrial Disclosures: 11/12/2016
30-day Trial Period for Defendant and Plaintiff in the Counterclaim: 12/28/2016
Counterclaim Defendant's and Plaintiff Rebuttal Disclosures Due: 1/12/2017
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff ends: 2/25/2017
Counterclaim Plaintiff's Rebuttal Disclosures Due: 3/12/2017
15-day Rebuttal Period for Counterclaim Plaintiff Ends: 04/10/2017
Plaintiff's Trial Brief Due: 06/10/2017
Defendant's Trial Brief and Plaintiff in the Counterclaim Due: 07/10/2017
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due: 08/09/2017
Reply Brief, if any, for Plaintiff in the Counterclaim: 08/24/2017

Respectfully submitted this 19th day of October, 2016.

/Karl R. Cannon/
Karl R. Cannon

CLAYTON, HOWARTH & CANNON, P.C.
Attorney for Opposer
Connect Public Relations, Inc.

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this document is today being submitted via electronic filing utilizing the ESTTA system on:

Date: October 19, 2016

/Karl R. Cannon/

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **STIPULATED MOTION FOR EXTENSION OF TRIAL DATES** to be served, via first class mail, postage prepaid, on this 19th day of October, 2016 to:

Thomas W. Cook, Esq.
Thomas Cook Intellectual Property Attorneys
3030 Bridgeway, Suite 425-430
Sausalito, California 94965-2810

/Karl R. Cannon/